

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)
v.)
STEPHANIE PRATT,)
Defendant)
) No. 23-cr- 55-LM-01
) Counts 1-6: Wire Fraud
) (18 U.S.C. § 1343)
)
)
)

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH SIX
[18 U.S.C. § 1343 – Wire Fraud]

At all times material to this indictment:

1. Company 1 is located in Hinsdale, New Hampshire.
2. The defendant, STEPHANIE PRATT, was employed as an office administrator for Company 1 between approximately June 2015 and December 2021.
3. Company 1 maintained a bank account ending in -0934 at TD Bank, which was open prior to June 2015 and remained open through November 2016.
4. Company 1 maintained a bank account ending in -2334 at Brattleboro Savings and Loan, which was opened in November 2016 and remained open past December 2021.
5. Chase is a financial services company that offers credit card services.
6. Chase maintains servers for processing credit card transactions in Colorado and South Carolina.
7. Company 1 maintained Chase credit cards. The first, ending -3197, was active prior to June 2015 and remained active until approximately December 17, 2019. The second,

ending -0013, was active beginning approximately December 18, 2019 and remained active past December 2021.

8. As an office administrator, PRATT had full access to Company 1's finances, including its bank accounts and credit cards.

9. PRATT maintained a bank account ending -2131 at Cheshire County Federal Credit Union and a bank account ending -1004 at GFA Federal Credit Union.

The Scheme and Artifice to Defraud

10. From in and around June 2015 through in and around December 2021, in the District of New Hampshire and elsewhere, the defendant knowingly devised and intended to devise a scheme and artifice to defraud Company 1.

11. Between in or about June 2015 through in or about December 2021, PRATT used her access to Company 1's bank account, check book, and credit cards to either transfer money from Company 1 to accounts she controlled or make personal purchases from a variety of retailers and companies, such as Amazon, Geico, and the Pampered Chef.

12. For example, between about June 2015 and about December 2021, PRATT wrote unauthorized checks totaling approximately \$350,000 payable to herself or cash. These checks were drawn on Company 1's bank accounts at TD Bank and Brattleboro Savings and Loan. PRATT concealed the fraudulent nature of these checks by claiming that they were payments to legitimate vendors which service Company 1.

13. PRATT also made at least one thousand unauthorized credit card purchases totaling over \$165,000 using Company 1's Chase credit cards.

14. To help conceal these purchases, PRATT doctored the credit card statements Company 1 received to delete the unauthorized purchases.

15. Through this scheme, PRATT embezzled at least \$515,000 from Company 1.

Wires in Furtherance of the Scheme – Counts One through Six

16. On or about the dates charted below, in the District of New Hampshire and elsewhere, the defendant,

STEPHANIE PRATT,

for the purpose of executing the scheme described above, and attempting to do so, did cause to be transmitted by means of wire communication in interstate commerce writings, signs, and signals, namely, the following Chase credit card purchases:

| Count | Date | Amount | Credit Card # | Purchase From | Payment For |
|-------|------------|------------|---------------|--------------------|--|
| 1 | 04/23/2019 | \$896.00 | -3197 | Southwest Airlines | Plane Tickets |
| 2 | 09/23/2020 | \$560.86 | -0013 | Geico | Insurance Premium |
| 3 | 11/13/2020 | \$259.05 | -0013 | Pampered Chef | Miscellaneous Spices and Food Products |
| 4 | 07/14/2021 | \$497.99 | -0013 | Amazon | Smart TV |
| 5 | 07/26/2021 | \$759.75 | -0013 | Amazon | Hot Tub |
| 6 | 09/20/2021 | \$5,425.95 | -0013 | ViaGoGo | Patriots Tickets |

NOTICE OF FORFEITURE

Upon conviction of one or more of the offenses set forth in Counts One through Six of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including a sum of money equal to the proceeds of the charged offenses.

All in accordance with 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461, and Rule 32.2(a), Federal Rules of Criminal Procedure.

TRUE BILL

Dated: July 5, 2023

/s/Foreperson
FOREPERSON

JANE E. YOUNG
UNITED STATES ATTORNEY

By: /s/Alexander S. Chen
Alexander S. Chen
Assistant U.S. Attorney